

EXHIBIT 2

ATTORNEY-A

- 7/9/2015

Page 162			Page 164		
15:57:09	1	might have sent you signed bank letters that you were	16:01:58	1	them if they would be willing to look into the matter.
15:57:11	2	expected to hold those in trust until it was resolved	16:02:01	2	Q What did they say?
15:57:16	3	pursuant to a notice of dismissal of the lawsuit?	16:02:02	3	A They don't say that much, but they asked me to
15:57:20	4	A Absolutely not, that's not what happened. The	16:02:07	4	describe what happened and then they asked me for some
15:57:24	5	bank letters were submitted for full signature and	16:02:10	5	documentation.
15:57:28	6	submitted to Chase Bank, they are dated as you provided	16:02:14	6	Q The person you contacted, did you contact a
15:57:34	7	to me, June 19th. That had nothing to do with this	16:02:17	7	specific person or just whoever happened to be available
15:57:38	8	attempt to try to resolve or settle things because there	16:02:20	8	to talk to?
15:57:43	9	was no settlement and these terms were never even	16:02:21	9	A I contacted a specific person.
15:57:48	10	closely obtained, but on June 19th, as a precondition to	16:02:32	10	Q When did you first contact the FBI?
15:57:54	11	meeting with Barry Reiss, he wanted to meet with me to	16:02:41	11	A It was probably March or April of 2014,
15:57:57	12	discuss the possibility of settling things and dealing	16:02:43	12	somewhere in there. That's a guess.
15:58:00	13	with the terms of settlement that certainly varied over	16:02:53	13	Q Was that before -- well, at some point did you
15:58:05	14	time, including the dismissal of the lawsuit.	16:02:56	14	approach Mr. Williams or Mr. Reiss about a concern that
15:58:10	15	I told him that we would not meet with him	16:03:00	15	there had been something inappropriate here and
15:58:12	16	unless my client's monies were released and that he sign	16:03:05	16	requesting the repayment of the funds?
15:58:16	17	the payment letters. I said, "It is my client's money.	16:03:07	17	A We were requesting financial information almost
15:58:20	18	It is Bill's money, let's get it back to him. You have	16:03:10	18	on a daily basis to understand the truth of what the
15:58:23	19	no basis at all under any permutation to continue to	16:03:18	19	dealings were here and what the money was used for and
15:58:28	20	hold his money given all that's occurred." They agreed	16:03:21	20	whether it was really there. I was involved in those
15:58:36	21	ultimately to sign these letters with us and submit them	16:03:25	21	discussions, as was Bill, as was his accountant, his
15:58:40	22	to Chase Bank, and on that basis, we had our meeting	16:03:29	22	outside accountant.
15:58:43	23	toward the end of June.	16:03:33	23	Q Is that Miss Joan Martin?
16:00:16	24	Q If I understand what you are saying, are you	16:03:36	24	A Yes.
16:00:17	25	saying that at some point you believe Mr. Reiss said	16:03:56	25	Q Other than the FBI, did you speak with any other
Page 163			Page 165		
16:00:21	1	that you could use the bank letters even though the	16:03:59	1	law enforcement?
16:00:23	2	other documents hadn't been signed?	16:04:01	2	A Yes.
16:00:25	3	A Absolutely. It was very clear.	16:04:01	3	Q What other law enforce meant?
16:00:30	4	Q Now, do you believe that's confirmed in writing	16:04:05	4	A The U.S. Attorney's Office.
16:00:31	5	somewhere?	16:04:10	5	Q Did you contact the U.S. Attorney or did they
16:00:33	6	A Yeah.	16:04:12	6	contact you?
16:00:51	7	Q Have you ever had any conversations with any law	16:04:13	7	A They contacted me.
16:00:54	8	enforcement regarding Mr. Williams?	16:04:16	8	Q When did they contact you?
16:01:00	9	A Yes, I have.	16:04:22	9	A You mean for the first time?
16:01:02	10	Q Who have you talked to?	16:04:23	10	Q Correct.
16:01:05	11	A I have talked to the FBI.	16:04:28	11	A I don't have a specific date. It might have
16:01:10	12	Q Did you contact them or did they contact you?	16:04:29	12	been the summer of 2014.
16:01:11	13	A Initially, I contacted them.	16:04:32	13	Q How many conversations have you had with the
16:01:16	14	Q Who did you contact?	16:04:34	14	U.S. Attorney's Office?
16:01:20	15	A You mean the name of the agent?	16:04:42	15	A Five or six.
16:01:22	16	Q Yes, please.	16:04:44	16	Q When was the last time you spoke with the U.S.
16:01:23	17	A I would rather not say.	16:04:46	17	Attorney's Office?
16:01:26	18	Q You understand that you are under an obligation	16:04:53	18	A Several weeks ago.
16:01:29	19	to provide testimony today, correct?	16:04:58	19	Q Is there an attorney assigned to this matter?
16:01:31	20	A Yes. If there is a ruling in this case	16:05:03	20	A I believe so.
16:01:36	21	pardoning me to disclose that information, I certainly	16:05:04	21	Q Do you know who that is?
16:01:43	22	will.	16:05:05	22	A Yes.
16:01:44	23	Q What did you tell the FBI about Mr. Williams?	16:05:05	23	Q Who is that?
16:01:46	24	A I told the FBI that I thought my client had been	16:05:08	24	A I would rather not answer.
16:01:52	25	victimized in a significant financial fraud and asked	16:05:12	25	Q I understand you are uncomfortable with it, but

ATTORNEY-A

- 7/9/2015

Page 166			Page 168		
16:05:16	1	to be clear on the record, are you refusing to answer	16:07:50	1	Q Do you know if it involves Mr. Seppala?
16:05:18	2	the question?	16:07:53	2	A Same answer.
16:05:19	3	A I am refusing to answer because of a pending	16:07:55	3	Q Or Mr. Reiss?
16:05:21	4	investigation, and I will abide by any ruling of the	16:07:57	4	A Same answer.
16:05:25	5	court in this regard.	16:08:01	5	Q In terms of the FBI, do you believe -- do you
16:05:31	6	Q I don't believe that the pending investigation	16:08:04	6	have some understanding as to whether or not they have a
16:05:32	7	stops you from talking about it. I know they won't talk	16:08:07	7	pending investigation?
16:05:35	8	about it.	16:08:08	8	A I consider it all one situation, so I don't know
16:05:36	9	MR. GALE: He already said he is not going	16:08:11	9	who is doing what or what they are doing.
16:05:37	10	to answer.	16:08:14	10	Q When is the last time you talked to the FBI?
16:05:38	11	MR. BURGEE: Right. I don't want to belabor	16:08:26	11	A Tuesday.
16:05:39	12	the point.	16:08:29	12	Q How many conversations have you had with the
16:05:40	13	Q This is something your counsel and I can take up	16:08:30	13	FBI?
16:05:43	14	in court if we need to.	16:08:34	14	MR. GALE: In total?
16:05:45	15	A Right.	16:08:35	15	MR. BURGEE: In total, yes.
16:05:46	16	Q We certainly won't come back here if we need to	16:08:37	16	A I couldn't tell you the number, it is several.
16:05:49	17	talk to you, we will just do something on video or on	16:08:57	17	Q Just in terms of a yes or no, not the substance,
16:05:51	18	the phone or something.	16:09:01	18	has Mr. Brown's name come up in your conversations with
16:06:01	19	Do you know what office of the U.S. Attorney you	16:09:04	19	the U.S. Attorney and the FBI?
16:06:03	20	were dealing with?	16:09:07	20	A I would rather not respond to any content of the
16:06:06	21	A New York, Southern District of New York.	16:09:09	21	discussions.
16:06:15	22	Q Did the U.S. Attorney's office tell you anything	16:09:10	22	Q I am just asking because it is important to my
16:06:17	23	about their investigation?	16:09:13	23	clients to know if there is a pending investigation or
16:06:21	24	A Tell me anything? Yes.	16:09:15	24	not.
16:06:31	25	Q You stated there was a pending investigation.	16:09:16	25	A I don't know who the subject of the
Page 167			Page 169		
16:06:33	1	Did they say something to you that led you to	16:09:17	1	investigation is. I don't know where that all stands.
16:06:35	2	believe that this is still an open pending matter as we	16:09:21	2	I know that I have been contacted from time to time and
16:06:38	3	sit here today?	16:09:29	3	they tell me almost nothing.
16:06:39	4	A Yes.	16:09:32	4	Q You have told them about all four movie
16:06:45	5	Q Do you know which individuals are being	16:09:34	5	investments?
16:06:47	6	investigated?	16:09:35	6	A Yes.
16:06:49	7	A No.	16:09:35	7	Q You have told them pretty much everything you
16:06:55	8	Q I presume Mr. Williams would be one of the	16:09:36	8	have told me today and possibly some more?
16:07:00	9	people that are being investigated?	16:09:41	9	A They asked questions about what transpired and
16:07:03	10	A I don't know what you presume or not. They	16:09:46	10	what documents exist and how much money Bill lost and
16:07:05	11	don't get into details.	16:09:52	11	what were the circumstances. When they contacted me or
16:07:11	12	Q Have they been asking about Mr. Brown?	16:09:55	12	requested a meeting, I answered their questions.
16:07:16	13	A I would rather not discuss any communications	16:10:25	13	Q Have you forwarded documents to the FBI or the
16:07:19	14	regarding the matter.	16:10:27	14	U.S. Attorney's Office?
16:07:22	15	Q Again, does that mean you are refusing to answer	16:10:29	15	A Upon their request, yes.
16:07:25	16	for today's purposes?	16:10:39	16	MR. BURGEE: With the understanding that we
16:07:26	17	A The same reason, if that's something that I am	16:10:40	17	may have an issue to raise as to conversations
16:07:29	18	compelled to respond to, I will.	16:10:43	18	with law enforcement and the U.S. Attorney's
16:07:31	19	Q In terms of just a yes or no question as to	16:10:46	19	Office, I would propose that the court reporter
16:07:33	20	whether you have some understanding, do you have any	16:10:49	20	copy the stipulation from yesterday's transcript
16:07:36	21	understanding as to whether there is a pending	16:10:51	21	just into this transcript, that way it is
16:07:39	22	investigation as to Mr. Brown?	16:10:53	22	identical.
16:07:40	23	A I believe that there is an ongoing investigation	16:10:57	23	MR. GALE: So stipulated.
16:07:43	24	in general. I don't know who it extends to and what its	16:10:58	24	MR. BURGEE: We can go off the record and
16:07:48	25	scope is.	16:10:59	25	conclude the deposition.